

United States District Court  
For The District of Massachusetts

Boston, MA Division 2023 FFC-6 PM '23 QB

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Case No. 1:06-CR-10004-RGS-1  
07-CR-10085-001-DPW

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James Bunchan,  
Movant,

v.

United States of America,  
Respondent.

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Supplement To Movant's  
Title 18 U.S.C. § 3582(c)(1)(A)  
Motion for Compassionate Release,  
Under The New November 1, 2023  
United States Sentencing Guidelines  
§ 1B1.13(b)(6), (6)(d), and (5).

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COMES NOW, Movant is a layman of the law, unskilled in the law, and therefore requests that this supplement to the Movant's already submitted Title 18 U.S.C. § 3582 (c)(1)(A) Motion be construed liberally. *Haines V. Kerner*, 404 U.S. 519 (1972).

Movant states the following reasons for this supplement:

- 1) According to U.S.S. Guideline § 1B1.13 (b)(6), Movant has been incarcerated for over 10 years, Movant is serving an unusually long sentence of 420 months in a Federal Prison, for a fraud conviction. Movant has been incarcerated for this offense since 2007, he is presently in very poor medical health and uses a wheelchair to get around. Also, as he has explained in his original compassionate release Motion, he suffers from various, serious acturial medical conditions, and is currently at the age of 72, where he requires medical assistance on a constant basis, to the extend that this prison is really not able to provide him with the constant medical assistance he needs, due to the constant lockdowns, murders and assaults as well as drug overdoses constantly transpiring in this prison and throughout the Federal Bureau of Prisons.
  
- 2) As the Movant explained in his first compassionate release Motion to this Honorable Court, the Age chart states that the Movant on average only has approximately 8 to 10 years left in which to live, Movant is therefore requesting compassionate release based on these extraordinary and compelling reasons.

U.S.S. Guideline § 1B1.13 (6)(d):Rehabilitational Progress

3) Movant, though in a wheelchair now, continues to strive by any means available to him, to educate himself by reading positive and constructive educational material and taking various programs. Even though he is in a wheelchair, Movant also speaks to the younger inmates and explains to them how important it is to not come back to prison, to take advantage of the programs available and learn from them, so that they will be better and more productive members of society upon their release.

U.S.S. Guideline § 1B1.13(5): Other Reasons

4) The other reasons for relief in regards to the Movant is his very poor health, his age, his constant need for transportation by wheelchair throughout the prison. The danger of the Movant being incarcerated at such an older age and not being able to protect himself from danger in these prisons due to his poor health and medical disabilities, quality as extraordinary and compelling circumstances and is why the Movant is humbly requesting compassionate release.

5) Movant is also serving an additional 300 months in this case separately, for a non-violent conspiracy to murder, Case No. 07-CR-10085-001-DPW. Movant is serving a total of 55 years. If released, Movant will be living with his son at the following address:

Fredric Bunchan  
12330 Bd Rolland Apt. 3  
Montreal-Nord, Quebec H1G 3W9, Canada  
Tel: (305)922-3024

**CERTIFICATE OF SERVICE**

I verify under the penalty of perjury, pursuant to 28 U.S.C. § 1746, that a copy of this filing was handed to prison officials for mail, with prepaid first class postage attached, to the following:

Clerk of Court  
Monkley US Courthouse  
One Courthouse Way  
Suite 2300  
Boston, MA 02210-3002

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11/17/23  
Date

Mail Box Rule  
Lack V. Houston,  
487 U.S. 266 (1988)

Signature: JH Bunchian  
Printed Name: James Bunchian  
Reg. No. 66583-004  
Facility Name: FCI Coleman Medium  
Address: P.O. Box 1032  
City, State ZIP: Coleman FL 33521